

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

Patricia Bolden,	)	
	)	
PLAINTIFF,	)	CASE NO:
	)	
VS.	)	
	)	
Sam's Wholesale,	)	
DEFENDANT.	)	

COMPLAINT

COMES NOW the Plaintiff, Patricia Bolden, by and through her attorney, Rolessa Powell Coleman, and files this Complaint the Defendant, Sam's Wholesale Inc. (Sam's Club at 201 Lakeshore Parkway, Birmingham, Alabama and for cause would respectfully state unto the Court the following to wit:

I.

The Plaintiff, Patricia Bolden is an adult citizen of Jefferson County, Alabama.

II.

The Defendant, Sam's Wholesale is a business in the State of Alabama and the County of Jefferson and may be served with process of this Honorable Court at the place of business located at 2101 S.E. Simple Savings Drive.

III.

That on the 22<sup>nd</sup> of December 2016, the Plaintiff, Patricia Bolden fell in a wet slippery unknown substance at Sam's Wholesale Store. The Defendant



failed to maintain a safe shopping environment for its customers. The Plaintiff sustained serious bodily injuries due to no fault of her own.

IV.

The Defendant, Sams Wholesale, breached his duty to the Plaintiff in the following manners:

- (a) in negligently failing to maintain safe conditions in the store;
- (b) in negligently failing to exercise reasonable care in the operation of the store;
- (c) in negligently failing to maintain proper warning signs;
- (d) in negligently operating its business in violation of existing state statutes.

V.

The Plaintiff bring suit and demand damages within the jurisdictional limitations of this Court.

Respectfully submitted

/s/Rolessa Powell Coleman  
Rolessa P. Coleman (POW057)  
Attorney for Plaintiff  
714 32<sup>nd</sup> Street South  
Birmingham, AL 35233  
(205) 224-4463